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December 8, 2003

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PUBLIC SERVICE
COMMISSION


Mr. Thomas M. Dorman
Executive Director
Public Service Commission
211 Sower Boulevard
P. O. Box 615
Frankfort, KY 40602

Re: SouthEast Telephone, Inc., Complainant v. BellSouth
Telecommunications, Inc., Defendant
PSC 2003-00105

Dear Mr. Dorman:

Enclosed for filing in the above-captioned case are the original and five (5) copies of BellSouth Telecommunications, Inc.'s Responses to SouthEast Telephone's First Set of Data Requests to BellSouth dated November 7, 2003.

Very truly yours,


Cheryl R. Winn

Enclosures

cc: Parties of Record

516723

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on the following individuals by mailing a copy thereof, this 8th day of December 2003.


Cheryl R. Winn

Hon. Jonathan N. Amlung
1000 Republic Bldg.
429 W. Muhammad Ali Blvd.
Louisville, KY 40202

Darrell Maynard
SouthEast Telephone, Inc.
106 Power Drive
P. O. Box 1001
Pikeville, KY 41502-1001



REQUEST: Is it BellSouth's assertion that the Federal Communications Commission's ("FCC") order in CC Docket No. 99-200 concerning Numbering Resource Optimization required Bellsouth to implement an 11-digit dialing plan instead of a 10-digit dialing plan? If the answer is in the affirmative, please explain in detail why an 11-digit dialing was required instead of a 10-digit dialing plan.

RESPONSE:

The Federal Communications Commission's ("FCC") order in CC Docket No. 99-200 concerning Numbering Resource Optimization *did not require Bellsouth to implement an 11-digit dialing plan* instead of a 10-digit dialing plan. However, with the implementation of number pooling and number portability for wireless service providers, BellSouth was forced to either redesign its offering for LTM to accommodate number pooling and wireless number portability or to eliminate the LTM Option service entirely.

As BellSouth responded to the Kentucky Commission Staff's 1st Data Request of August 5, 2003, Item Number 1, in order to retain the Land to Mobile Option a dialing plan change to 11 digit dialing was necessary. As was explained in the August 5th response, in the FCC's Order for Number Resource Optimization in Docket 99-200, released April 24, 2002, the FCC ordered Wireless Telephone Number Pooling to be effective November 24, 2002. Wireless Number Pooling (and porting scheduled for 11/24/2003) affected the reverse toll billing service offered by BST called the Land to Mobile (LTM) Option (GSST A35). For further detail, please see BellSouth's August 5, 2003 response to PSC Data Request No. 1.



REQUEST: In complying with the FCC's order in CC Docket No. 99-20, what necessitated the change to the current 11-digit dialing plan, BellSouth's routing infrastructure or the billing system? Explain.

RESPONSE:

The dialing pattern change was necessary because of parameters in central office translations (1000 number blocks, rather than entire NXXs), and because of the need to provide accurate billing for LTM calls. As stated in the response to Item Number 1, 10 digit dialing for LTM in the porting/pooling environment would result in some land line customers paying toll charges and the wireless carriers paying for others. The caller would receive no indication as to which of the two billing events would take place when dialing the call. In addition, land line customers paying toll charges would be billed by BellSouth for those toll charges even if those customers had chosen other intraLATA toll providers. Please see the response to Item Number 1 for further explanation.



REQUEST: Prior to the adoption of the 11-digit dialing plan, did BellSouth ever use a 10-digit dialing plan? If so, please state the following,

- (a) The dates on which ten-digit dialing was utilized;
- (b) The geographic areas where ten-digit dialing was utilized;
- (c) The reasons that 10-digit dialing is no longer being used with explanation as to why it is no longer being used. In your explanation, please describe the problem in complete detail, and explain whether it was billing-related, routing-related or due to customer confusion.

RESPONSE:

- (a) In its September 26, 2001 Order in Administrative Case No. 388, the Commission ordered that all LTM seven-digit dialing that crossed NPA boundaries be eliminated within 90 days of the date of the Order. The Commission took this step as a number conservation effort in order to avoid the unnecessary protection of NXX codes in multiple NPAs.
- (b) In response to the Commission's Order, BellSouth converted all such dialing arrangements to ten-digits. The primary concentration of these arrangements was located in the Louisville and Winchester LATAs.
- (c) Please see the responses to Items No. 1 and No. 2.



REQUEST: Were other dialing plans considered or tested before the 11-digit dialing plan was adopted? If the answer is in the affirmative, please describe in complete detail:

- (a) What plan(s) were tested?
- (b) When was the plan(s) tested?
- (c) What was the result of the testing?

RESPONSE:

As explained in the response to Item Number 1, BellSouth developed a means to continue to offer the Land to Mobile Option service rather than eliminate the service as other LECs nationwide elected to do. The only solution to retain LTM in a wireless number pooling and porting environment requires BST to eliminate local dialing patterns (7 or 10 digit) for calls originating from BST served numbers within the LATA. The new dialing pattern requires the originating customer to dial the LTM number in accordance with the standard network dialing pattern associated with the assigned LTM NPA-NXX rate center. Depending on the local calling plan of the originating BST subscriber, the dialing pattern for placing a call to a LTM number may require 1+ 10 digit dialing, even though there is no charge on the originating caller's bill for a call carried by BST.

This change in dialing pattern is necessary since the LTM designation for an NPA NXX code does not guarantee that all numbers within the code will receive LTM treatment. As previously stated, BellSouth was forced to either redesign its offering for LTM to accommodate number pooling and wireless number portability or to eliminate the LTM Option service entirely. BellSouth had the option of totally withdrawing the LTM Option as did most LECs, or offering the existing solution.



REQUEST: In response to the Commission's Item No. 5(a), could BellSouth not have adapted their optional Land-to-Mobile Service to work within the wireless number pooling and porting environment instead of eliminating local dialing patterns (7 or 10-digit) for all intraLATA toll calls originating from BellSouth served within the LATA? Why or why not?

RESPONSE:

The change in dialing pattern was necessary in order to retain LTM as a service offering to wireless carriers. The changes BellSouth has made in LTM service do work in the wireless number pooling and porting environment, as has been explained. To BellSouth's knowledge, BellSouth's is the only solution nationwide that allows retention of such reverse toll calling plans in a full ongoing wireless number pooling and porting environment.



REQUEST: In regard to the Commissions Item (5), BellSouth's answer to 5(c) addressing customer confusion,

- (a) did BellSouth take any preventive steps to make the general public aware that numbers that had previously been toll-free were now going to be billed? If so, please describe in detail each step taken, including the persons and/or entities were notified, the timing of the notifications, and the content and method of each such notification.
- (b) did BellSouth notify institutions such as hospitals, schools, and prisons that use PBX systems? If so, please identify which institutions were notified, including in your answer the timing, content and method of such notification.

RESPONSE:

- (a) BellSouth provides Land-to-Mobile (LTM) service to wireless carriers. Wireless carriers who subscribe to LTM from BellSouth then market the service to their customers.

The change in dialing pattern affects the general public in two ways when calls are made to wireless LTM customers: 1) in the number of digits that must be dialed for a call to be completed, and 2) possibly in the way the call is billed - depending on whether the wireless carrier continues to subscribe to LTM from BellSouth, whether the wireless customer continues to subscribe to LTM service from their wireless carrier, and whether the wireline customer subscribes to BellSouth Telecommunications service for their local toll calling.

RESPONSE: (Cont.)

BellSouth is not in a position to advise members of the general public whether LTM calls that were once dialed toll-free with seven digits will now incur toll charges, because BellSouth knows neither the marketing plans of wireless carriers nor subscription plans of the wireless customers. Definitive information regarding the number of digits that must be dialed is effectively communicated to members of the general public through the intercept message provided the caller when a call requiring eleven digits is attempted with seven digits. Definitive information regarding billing is not available to BellSouth to be communicated.

The wireless carriers are in the best position to communicate information relative to changes in LTM service to their customers who subscribe to the service. With that information, the wireless customer is armed with the knowledge of whether their wireless carrier has chosen to continue to offer LTM service, and can decide for themselves whether they wish to continue to subscribe to that service with the new dialing pattern. Those wireless customers can then decide the best means of communicating the changes associated with how they can be called to their individual customers.

All of these considerations were discussed at length at the informal conference conducted by the Kentucky Public Service Commission on December 18, 2002. In order to give wireless carriers more time to communicate with their customers and for the wireless customers to communicate the LTM changes to their customers, BellSouth agreed to extend the implementation date for the dialing change from December 31, 2002 until February 28, 2003 for the 270, 606, and 859 NPAs.

(b) Please see the response to 6(a).



REQUEST: Were new billing systems considered or tested before the 11-digit dialing plan was adopted? If so, please describe in complete detail those systems that were considered or tested, including in your answer an explanation as to why they were not adopted.

RESPONSE:

BellSouth did not consider adopting a complete new billing system in order to retain the local dialing plan for the Land to Mobile Option. The cost of any new billing system or any solution other than the one BellSouth implemented was assumed to be prohibitive. BellSouth's solution allowed the service to be retained, with the dialing plan change that has been discussed.



REQUEST: Is the primary purpose of 11-digit dialing in the BellSouth's Optional (LTM) Service to ensure that the billing system will render a correct bill to customers other their own? Please explain.

RESPONSE:

The primary purpose for the changes that BellSouth has made to Land to Mobile service is to provide accurate billing after wireless number pooling and porting are implemented. In the pooling and porting environment, a customer who makes an intraLATA call to a number that is not within the originating local calling area will be billed a toll charge if the called number is ported to a carrier that does not offer LTM service. BellSouth would not know in this environment if the carrier offered LTM till the bill was processed

If only 10 digits were required then many end users would place calls dialing 10 digits only to see intraLATA toll charges on their bill. In addition it might not be a bill from their intraLATA toll provider of choice. As the calling pattern is now designed (1+), the calling customer has notice that the call that is being made may incur toll charges. If the wireless carrier elects the LTM option and the caller's local intraLATA carrier is BST, the wireless carrier will pay BellSouth for the call, and the wireless carrier will charge its customer for the service.



BellSouth Telecommunications, Inc.
KY PSC Dkt No. 2003-00105
SouthEast Tel's 1st Data Request
November 7, 2003
Item No. 9
Page 1 of 1

REQUEST: Is BellSouth aware that ALLTEL currently allows 10-digit dialing?

RESPONSE:

No. It is BellSouth's understanding that ALLTEL eliminated its Reverse Toll Billing service on November 7, 2003, and all calls made after that date from a wireline to a wireless customer served by an office outside the originating customer's local calling area will require 11-digit dialing.